

## Exhibit E

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS**

J.A.V., et al,

*Petitioners.*

v.

DONAD J. TRUMP, et al.,

*Respondents.*

Civil Action No. 1:25-cv-00072

**DECLARATION OF ASSISTANT FIELD OFFICE DIRECTOR**

I, Carlos D. Cisneros, pursuant to the authority of 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am currently employed by the U.S. Department of Homeland Security (DHS), United States Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), as the Assistant Field Office Director (AFOD) for the Harlingen, Texas (TX), which is responsible for ERO detained operations in Harlingen, TX.
2. As AFOD, I oversee ERO detention operations for the Harlingen Office. I have been employed with ICE ERO for more than twenty-five years. As an AFOD, I am responsible for the supervision of the deportation officers having detained docket control over the Harlingen detained dockets. In my role as the AFOD, I have access to records maintained in the ordinary course of business by ICE, including documentary records concerning the Harlingen, TX ERO Field Office and the alien detainees who fall within the responsibility of that field office.
3. I base this declaration on my personal knowledge and on information contained in ICE's electronic records and databases.

**J.A.V.**

4. J.A.V. is a native and citizen of Venezuela. He unlawfully entered the United States on or about May 3, 2023, without inspection.
5. On June 11, 2024, J.A.V. was served in person with a Notice to Appear (NTA) charging him with inadmissibility under section 212(a)(6)(A)(i) of the Immigration and Nationality Act (INA).
6. On February 27, 2025, J.A.V. was arrested by the Long Island, New York (NY) Fugitive Operations and Homeland Security Investigations (HSI) at the United States Citizenship and Immigration Services (USCIS) Asylum Office in Bethpage, NY pursuant to a warrant for arrest (I-200).
7. On February 28, 2025, J.A.V. was transferred to the Moshannon Valley Processing Center (MVPC). On March 9, 2025, J.A.V. was transferred to the El Valle Detention Facility in Raymondville, TX. He remains in El Valle at the present time.
8. On April 22, 2025, DHS filed a motion to dismiss the current removal proceedings without prejudice to allow DHS to pursue expedited removal proceedings under section 235 of the INA. The motion is currently pending before the Immigration Judge.
9. J.A.V. is currently scheduled for a Master Calendar Hearing in Immigration Court on April 30, 2025.

**J.G.G.**

10. J.G.G. is a native and citizen of Venezuela. He unlawfully entered the United States on or about March 25, 2024, at or near El Paso, TX without inspection.
11. On March 26, 2024, U.S. Border Patrol served J.G.G. with an NTA charging him with inadmissibility under section 212(a)(6)(A)(i) of the INA. U.S. Border Patrol released him that day on an Order of Release on Recognizance.
12. On October 2, 2024, J.G.G. attended a Master Calendar hearing at the Concord, California (CA) Immigration Court.
13. On October 3, 2024, J.G.G. reported to the San Francisco ERO Field Office. ERO officers interviewed J.G.G. where he made admissions that suggested he was affiliated with or a member of Tren de Aragua (TdA). ERO took J.G.G. into custody that day.

14. J.G.G. was housed in the Golden State Annex facility from October 3, 2024, until March 8, 2025, when he was transferred to El Valle Detention Facility in Raymondville, TX. He remains in El Valle at the present time.
15. On December 13, 2024, J.G.G. filed an asylum application as his sole form of relief.
16. On February 11, 2025, a custody redetermination hearing was held before an Immigration Judge, who denied J.G.G.'s request for a change in custody status by written order dated February 11, 2025.
17. J.G.G. is currently scheduled for a Master Calendar Hearing in Immigration Court on May 22, 2025.

**W.G.H.**

18. W.G.H. is a native and citizen of Venezuela. He unlawfully entered the United States on or about October 7, 2023, without inspection.
19. On December 18, 2023, W.G.H. was served in person with a Notice to Appear (NTA) charging him with inadmissibility under section 212(a)(6)(A)(i) of the INA.
20. On November 27, 2024, W.G.H. filed an asylum application as his sole form of relief.
21. On February 20, 2025, W.G.H. was arrested by New York HSI Task Force agents in Brooklyn, NY, pursuant to a warrant of arrest (I-200).
22. On February 20, 2025, W.G.H. was transferred to the Moshannon Valley Processing Center (MVPC). On March 9, 2025, W.G.H. was transferred to the El Valle Detention Facility in Raymondville, TX. He remains in El Valle at the present time.
23. W.G.H. is currently scheduled for a Master Calendar Hearing in Immigration Court on April 23, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this \_\_\_\_\_ day of April 2025.

**CARLOS D  
CISNEROS JR**  Digitally signed by  
CARLOS D CISNEROS JR  
Date: 2025.04.22  
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Carlos D. Cisneros  
Assistant Field Office Director  
Enforcement and Removal Operations  
U.S. Immigration and Customs Enforcement